REMARKS

Status of Claims

The Office Action mailed January 24, 2005 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-9 were pending in the application. Claims 1, 8, and 9 have been amended and no claims have been canceled or newly added. Therefore, claims 1-9 are pending in the application.

This amendment changes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

Prior Art Rejections

In the Office Action, claims 1-4 and 6-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. patent 6,718,368 to Ayyadurai (hereafter "Ayyadurai") in view of U.S. Patent Publication Application No. 2003/0208434 to Posner (hereafter "Posner"), in further view of Microsoft® Outlook 2000 (hereafter "Outlook"). Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Ayyadurai, in view of U.S. patent 6,651,217 to Kennedy et al. (hereafter "Kennedy"). Applicant respectfully traverses this rejection for at least the following reasons.

Each of the independent claims recite, *inter alia*, a method (or system/software) of processing an inbound document sent by a particular trading partner which automatically determines a set of candidate reply transactions associated with the inbound document and the particular trading partner that sent the inbound document without performing a language analysis of the content of the inbound document. This claimed feature is supported in the specification, for example, at page 5, lines 25-30. At least this recited feature is not disclosed or suggested by the applied prior art.

Specifically, Ayyadurai, which is the primary reference relied on in the office action, discloses that an incoming message is received at the filter and modeler 30 which "performs language analysis and characterization of the content of the text message...yielding a tagged message (31)...." See col. 5, lines 60-64 of Ayyadurai. Furthermore, Ayyadurai discloses that this "tagged message" is received by the automatic reply composer (91) for further

processing in which partial replies or reply phrases are added. See col. 6, lines 15-21 of Ayyadurai. Therefore, Ayyadurai clearly does not teach the claimed features recited in the pending independent claims which require that the set of candidate reply documents be automatically determined without performing a language analysis of the content of the inbound document. Accordingly, no *reasonable* interpretation of these features in the pending claims is disclosed by Ayyadurai.

Since these deficiencies in Ayyadurai are not cured by any of the other applied references, the office action fails to make a *prima facie* case of obviousness with respect to the pending claims. Specifically, neither Outlook nor Posner discloses or suggests at least this claimed feature. Accordingly, the pending independent claims 1, 8, and 9 are patentable over the applied prior art since at least this claimed feature is missing from all of the applied references.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional reasons for their patentability when considered as a whole.

For example, claim 2 recites that the system determines the set of candidate reply transaction documents by looking up a database indexed by the trading partners and the inbound document types. No such database indexed as claimed is disclosed or suggested by the applied prior art. Accordingly, this recited feature provides an additional reason for the patentability of this claim.

Conclusion

In view of the above, applicant believes that the present application is now in condition for allowance. An early notice of the same is respectfully solicited. The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicant hereby petitions for any needed extension of time.

Respectfully submitted,

Date April 25, 2005 (Monday)

By Aaron C. Chatterjee

FOLEY & LARDNER LLP
Customer Number: 22428
Telephone: (202) 672-5485
Facsimile: (202) 672-5399

William T. Ellis
Registration No. 26,874

Aaron C. Chatterjee
Registration No. 41,398

Attorneys for Applicant